

JONATHAN D. BLUM, ESQ.
Nevada Bar No. 09515
WILEY PETERSEN
1050 Indigo Dr., Suite 200B
Las Vegas, Nevada 89145
Telephone No.: (702) 910-3329
Facsimile No.: (702) 553-3467
jblum@wileypetersenlaw.com

Attorney for Plaintiff, Edward Patrick Flaherty

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDWARD PATRICK FLAHERTY, an individual,

Plaintiff,

vs.

WELLS FARGO BANK, NATIONAL
ASSOCIATION dba WELLS FARGO BANK NA;
and DOES 1-50, ROES 51-100.

Defendants.

CASE NO.: 3:22-cv-00025-MMD-CLB

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
PLAINTIFF TO FILE SECOND
AMENDED COMPLAINT**

(Third Request)

Plaintiff, Edward Patrick Flaherty ("Plaintiff") and Defendant, Wells Fargo Bank, N.A. ("Wells Fargo") (collectively, the "Parties"), by and through their undersigned counsel of record, for good cause shown, hereby stipulate and agree to extend Plaintiff's deadline to file his *Second Amended Complaint* from May 22, 2023 to May 29, 2023. This is the Parties' third request for an extension. The Parties request the extension for the following reasons:

1. On May 10, 2023, this Court granted the Parties' Stipulation and Order to Extend Deadline for Plaintiff to file Amended Complaint (Second Request) (ECF No. 45), which extended the deadline from May 11, 2023 to May 22, 2023.

2. Since then, the Parties have made substantial progress in reaching a comprehensive settlement. However, some final details require additional client input and approval, before finalization. The Parties are optimistic about settlement, but need a few additional days to finalize the settlement terms, and seek to avoid incurring additional attorneys' fees by filing further pleadings

unnecessarily. The Parties seek an additional and final 7-day extension of the deadline in an attempt to fully resolve this matter.

3. The Parties respectfully request a seven (7) day extension for Plaintiff to file his Amended Complaint from May 22, 2023 to and including **May 29, 2023**.

This stipulated extension is for good cause, and not for improper delay.

DATED this 22 day of May, 2023.

SNELL & WILMER LLP

By: /s/ Kelly Dove
KELLY H. DOVE, ESQ.
Nevada Bar No. 10569
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
kdove@swlaw.com
hcheong@swlaw.com

Attorneys for Defendant

DATED this 22 day of May, 2023.

WILEY PETERSEN

By: [Signature]
JONATHAN D. BLUM, ESQ.
Nevada Bar No. 9515
1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145
Ph: 702.910.3329
jblum@wileypetersenlaw.com

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

]Dated May 22, 2023

[Signature]

UNITED STATES DISTRICT JUDGE